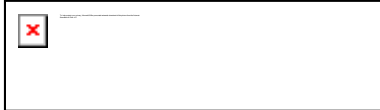


## Morgan Rose

---

**From:** Sarah A. Zylstra  
**Sent:** Tuesday, March 29, 2022 2:48 PM  
**To:** Covaleski, Paul; Ingrisano, Jonathan; Wittenwyler, Mike; Noel Sterett  
**Cc:** Kimberly Crowell; Evan Tenebruso; Tanner G. Jean-Louis; Knapp, Bruce  
**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

They do not. I need him before summary judgment. I think we can fit him in the last week in April along with the others.



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**From:** Covaleski, Paul <PCovaleski@gklaw.com>  
**Sent:** Tuesday, March 29, 2022 2:39 PM  
**To:** Sarah A. Zylstra <szylstra@boardmanclark.com>; Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>  
**Cc:** Kimberly Crowell <KCrowell@boardmanclark.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Knapp, Bruce <BKnapp@gklaw.com>  
**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

We have spoken with Mike, and propose taking his deposition June 2-3 or 6-8. Preparing for and taking his deposition the last week of April along with the 3 deponents that we requested over a month ago is not feasible. Jonathan is unavailable the first two weeks in May, and the end of May is completely booked for Mike as he deals with graduation and the end of the school year.

Please let us know if any of those dates work for you.

Thanks,

**Paul Covaleski** | Attorney  
608.284.2619 direct | [PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)

**GODFREY & KAHN<sup>LLC</sup>**

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**From:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>

**Sent:** Monday, March 28, 2022 2:26 PM

**To:** Covalleski, Paul <[PCovalleski@gklaw.com](mailto:PCovalleski@gklaw.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>

**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>

**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

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Paul,

What is the status of scheduling Mike Elliot's deposition? I would like to get that on the calendar.



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**From:** Covalleski, Paul <[PCovalleski@gklaw.com](mailto:PCovalleski@gklaw.com)>

**Sent:** Thursday, March 24, 2022 9:15 AM

**To:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>

**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>

**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

Let's schedule Alder Evers for the 28<sup>th</sup>, and please block off 7 hours for that deposition.

Let's also schedule Mr. Hank for the 27<sup>th</sup> and Mr. Tucker for the 29<sup>th</sup>. We will not need a full day for Mr. Hank, so perhaps we can block off the morning for his deposition. We are still going back and forth a little bit on how much time we will need for Mr. Tucker – for now please block off the full day, but we will get back to you shortly to confirm.

Thanks,

**Paul Covalleski** | Attorney  
608.284.2619 direct | [PCovalleski@gklaw.com](mailto:PCovalleski@gklaw.com)



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**From:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>

**Sent:** Wednesday, March 23, 2022 11:35 AM

**To:** Covalleski, Paul <[PCovalleski@gklaw.com](mailto:PCovalleski@gklaw.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>

**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>

**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

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Paul,

I write about several matters.

First, attached is a response to your meet and confer related to the request for admissions.

Second, neither April 8 nor 11 work for depositions. I have checked with the deponents and the last week of April generally work for them and us. For Mr. Evers, he is only available April 25, 28 and possibly the 29th. The 25<sup>th</sup> or 28<sup>th</sup> would be better if possible. For Mr. Tucker and Mr. Hank, I believe all the dates that week work. Please get back to me ASAP on the proposed dates/schedule so we can lock it in. Please let me know whether the witness must block off 7 hours or whether you think any of them will only be a half day (I won't hold you to it if you run over a bit but for scheduling purposes if you think you will only go a half day, for example, with Mr. Hank, it would be useful to know).

Third, I want to take Mike Elliot's deposition. I am fine to take it earlier than the last week of April if we can find a date that works but otherwise I will want him that same week. As he is the first on your side, I will likely go most of the day with him.

Fourth, we are working on another round of production of documents to you. I don't have an exact date of when those will be going out but will let you know when I have a firmer idea.

Fifth, we have received your discovery responses, but I don't believe we have received any documents from you. What is your ETA on when we will start getting your documents?

Thank you.



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**From:** Covalleski, Paul <[PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)>

**Sent:** Sunday, March 20, 2022 11:44 AM

**To:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>

**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>

**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

Do either April 8 or April 11 work for Alder Evers' deposition? If not, we would be looking at the last week of April, and would like to try and schedule Mr. Hank and Mr. Tuckers' depositions for that week as well.

Thanks,

**Paul Covalleski** | Attorney  
608.284.2619 direct | [PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)



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**From:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>

**Sent:** Monday, March 14, 2022 2:08 PM

**To:** Covalleski, Paul <[PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>

**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>

**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

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Does April 21 work for you for Alder Evers' deposition?



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**From:** Covalleski, Paul <[PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)>

**Sent:** Friday, March 11, 2022 1:55 PM

**To:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>  
**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>  
**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

Thanks for sending this date over – unfortunately, that doesn't work for us as the 14<sup>th</sup> is Holy Thursday and Jonathan will be travelling. Does either the 12<sup>th</sup> or the 13<sup>th</sup> work for you and Mr. Evers?

Thanks,

**Paul Covaleski** | Attorney  
608.284.2619 direct | [PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)



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**From:** Sarah A. Zylstra <[szylstra@boardmanclark.com](mailto:szylstra@boardmanclark.com)>  
**Sent:** Tuesday, March 8, 2022 4:19 PM  
**To:** Covaleski, Paul <[PCovaleski@gklaw.com](mailto:PCovaleski@gklaw.com)>; Ingrisano, Jonathan <[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)>; Wittenwyler, Mike <[mwittenw@gklaw.com](mailto:mwittenw@gklaw.com)>; Noel Sterett <[nsterett@daltontomich.com](mailto:nsterett@daltontomich.com)>  
**Cc:** Kimberly Crowell <[KCrowell@boardmanclark.com](mailto:KCrowell@boardmanclark.com)>; Evan Tenebruso <[ETenebruso@boardmanclark.com](mailto:ETenebruso@boardmanclark.com)>; Tanner G. Jean-Louis <[TJeanLouis@boardmanclark.com](mailto:TJeanLouis@boardmanclark.com)>; Knapp, Bruce <[BKnapp@gklaw.com](mailto:BKnapp@gklaw.com)>  
**Subject:** RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

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Paul,

I am doing this piecemeal but I am trying to work with various schedules and his may be the toughest to schedule. Can we schedule Tag Evers' deposition for April 14?

I will note that I know you asked for the end of March but I already have other matters scheduled for every day that week and I have an all-day injunction hearing on April 5.

If you can let me know as soon as you can, I would appreciate it.



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